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7 Attorney for Secured Creditor

8 **UNITED STATES BANKRUPTCY COURT**  
9 **NORTHERN DISTRICT OF CALIFORNIA – SAN FRANCISCO DIVISION**

10 In re:  
11 Kedra Renee Rhodes-Sumler,

CASE NO.: 23-30609

CHAPTER: 13

**OBJECTION TO CONFIRMATION OF  
CHAPTER 13 PLAN**

Confirmation Hearing:

Date: 11/15/2023

Time: 10:00 a.m.

Place: via Tele/Videoconference -  
[www.canb.uscourts.gov/calendars](http://www.canb.uscourts.gov/calendars)

22 Debtor.

23  
24 **TO THE HONORABLE DENNIS MONTALI, UNITED STATES BANKRUPTCY COURT**  
25 **JUDGE, THE DEBTOR, THE TRUSTEE, AND OTHER INTERESTED PARTIES:**

26 Nationstar Mortgage LLC ("Secured Creditor") hereby objects to the confirmation of the  
27 Debtor's Chapter 13 Plan in the above-captioned matter. Secured Creditor objects to the Debtor's  
28 Chapter 13 Plan on the following grounds:

1       **1. Secured Creditor's claim relating to the Property.** Secured Creditor's claim is secured by  
2 the real property commonly known as 108 Marsala Ct, Hercules, CA 94547 (the "Property"). At the  
3 time of the bankruptcy petition filing, Secured Creditor's claim was in the approximate amount of  
4 \$385,209.95, including arrearage in the approximate amount of \$37,864.52. The Debtor is the  
5 borrower of record with respect to Secured Creditor's loan and the trustor under the respective deed  
6 of trust. However, the Debtor did not schedule the Property or the claim.

7       **2. Objection.** Due to the claim having arrears, Secured Creditor would request that the Debtor  
8 either treat the claim (assuming Debtor still asserts an ownership interest in the Property) or surrender  
9 the claim so it is clear that the claim will not be a part of Debtor's reorganization.

10       **WHEREFORE,** Secured Creditor respectfully requests that:

- 11       1. Confirmation of Debtor's Chapter 13 Plan be denied; or, in the alternative,  
12       2. Debtor's Plan be amended in accordance with this Objection.  
13       3. For other such relief as the Court deems just and proper.

14       Dated: October 3, 2023

Respectfully Submitted,

McCalla Raymer Leibert Pierce, LLP

17       By: /s/Dane Exnowski

18       Dane Exnowski

19       Attorney for Secured Creditor